

ELLEN F. ROSENBLUM  
Attorney General  
JAMES S. SMITH #84093  
Senior Assistant Attorney General  
DIRK L. PIERSON #94128  
Senior Assistant Attorney General  
Trial Attorneys  
Department of Justice  
1162 Court Street NE  
Salem, OR 97301-4096  
Telephone: (503) 947-4700  
Fax: (503) 947-4791  
Email: James.S.Smith@doj.state.or.us  
Dirk.L.Pierson@doj.state.or.us

Attorneys for Defendants Oregon Department of Human Services (DHS), Diane Bradley, Tanya Burroughs (fka Gilbert), and Judi Martin

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

A.G.; B.J.; D.S.; E.K.; EP.-D.; J.B.;  
K.R.; M.F.; S.B.; and JANE AND JOHN  
DOES 1-50,

Plaintiffs,

v.

THE OREGON DEPARTMENT OF HUMAN SERVICES ("DHS"), a government agency; JANE DOE CERTIFIER, in her individual capacity, an individual; JANE OR JOHN DOE CERTIFIER-SUPERVISOR 1, in his or her individual capacity, an individual; JUDI MARTIN, in her individual capacity, an individual; JANE OR JOHN DOE CERTIFIER-SUPERVISOR 2, in her or his individual capacity; JANE DOE ADOPTION CASEWORKER, in her individual capacity, an individual; JANE OR JOHN DOE ADOPTION CASEWORKER-SUPERVISOR, in his or her individual

Case No. 3:13-cv-01051-AC

DEFENDANTS DHS, BRADLEY, BURROUGHS, AND MARTIN'S RESPONSE TO PLAINTIFFS' MOTION TO FILE A REPLY CONCERNING MOTION TO COMPEL

Page 1 - DEFENDANTS DHS, BRADLEY, BURROUGHS, AND MARTIN'S RESPONSE TO PLAINTIFFS' MOTION TO FILE A REPLY CONCERNING MOTION TO COMPEL  
JSS/cbh/4880366-v1

capacity, an individual; JAMES EARL MOONEY, in his individual capacity, an individual; JANE OR JOHN DOE CASEWORKERS A 1-9, in their individual capacities; JANE OR JOHN DOE CASEWORKER-SUPERVISORS B 1-9, in their individual capacities; JANE OR JOHN DOE CASEWORKERS C 1-50, in their individual capacities; JANE OR JOHN DOE CASEWORKER-SUPERVISORS D 1-50, in their individual capacities; TANYA BURROUGHS, in her individual capacity, an individual; DIANE BRADLEY, in her individual capacity, an individual; JANE OR JOHN DOE DEFENDANTS 1-25, in their individual capacity,

Defendants.

This Court's Local Rules limit the briefing on discovery motions, prohibiting a Reply brief. Plaintiffs seek permission for a Reply brief concerning the Plaintiffs' Motion to Compel, but have offered nothing that distinguishes this case or these facts from any of the other civil cases to which the Local Rules apply. Moreover, the parties in this case have agreed that the Court should consider all discovery issues pending at oral argument on January 15, 2014.

DATED December 30, 2013.

Respectfully submitted,

ELLEN F. ROSENBLUM  
Attorney General

s/ James S. Smith  
JAMES S. SMITH #84093  
DIRK L. PIERSON #94128  
Senior Assistant Attorney General  
Trial Attorneys  
Tel (503) 947-4700  
Fax (503) 947-4791  
James.S.Smith@doj.state.or.us  
Dirk.L.Pierson@doj.state.or.us  
Of Attorneys for Defendants Oregon  
Department of Human Services (DHS),  
Diane Bradley, Tanya Burroughs (nka  
Gilbert), and Judi Martin

Page 2 - DEFENDANTS DHS, BRADLEY, BURROUGHS, AND MARTIN'S RESPONSE TO PLAINTIFFS' MOTION TO FILE A REPLY CONCERNING MOTION TO COMPEL  
JSS/cbh/4880366-v1